

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36

Annual Section 64.2009(e) CPNI Certification for 2016, covering prior year 2015

Date Filed: March 1, 2016

Name of companies covered by this certification: Perseus Telecom Limited

499 Filer ID No.: 828313

Name and Title of Signatory: Dr. Jock Percy, Chief Executive Officer

I, Jock Percy, certify that I am an officer of Perseus Telecom Limited (the "Company"), and acting as an agent of the Company, I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, 47 C.F.R. § 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in Section 64.2001, *et seq.* of the Commission's rules.

The Company did not take any actions (proceedings instituted or petitions filed by a company at state commissions, in the court system or at the Commission) against data brokers in 2015. The company did not receive any customer complaints during 2015 concerning the unauthorized release of CPNI. The Company does not have any information outside of the information that is publicly available regarding the processes that pretexters are using to attempt to access CPNI. The Company has taken steps to protect CPNI, which are highlighted in the attached document.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: _____

Dr. Jock Percy, Chief Executive Officer, Perseus Telecom Limited

Date: _____

2/20/16

Attachment: Accompanying Statement Explaining CPNI Procedures

Perseus Telecom Limited
Statement Regarding Customer Proprietary Network Information Operating Procedures

Perseus Telecom Limited ("Perseus"), in accordance with Section 64.2009(e) of the Commission's rules, submits this statement summarizing how the Perseus's operating procedures are designed to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules.

Perseus values its customers' privacy and takes measures to protect CPNI. Perseus does not use, disclose or permit access to its customers' CPNI except as permitted by Section 222 of the Communications Act of 1934, as amended, and the Commission's implementing rules.

As necessary, Perseus may use CPNI for the permissible purposes enumerated in the Act and the Commission's rules, including, but not limited to, initiating, rendering, billing and collecting for telecommunications services. Perseus may also use CPNI to protect its rights or property.

Perseus has in place a process for verifying its customers' identity during an inbound call. Except for business customers who have specifically authorized release of CPNI pursuant to a procedure established by contract, Perseus does not release call detail information during an inbound call. Perseus also requires customers to provide their proprietary service identification code to be used to authenticate the customer's identity in order to access account information.

Perseus trains its personnel in the permissive use of CPNI. Perseus has an express disciplinary process in place for violations of Perseus's CPNI policies.

Perseus does not use CPNI to market products or services to customers outside of the category of service to which the customer already subscribes. Perseus does not share CPNI with affiliates or third parties for marketing purposes. If, in the future, Perseus seeks to use CPNI for these purposes, it will provide the appropriate notice to its customers and will maintain a list of customer preferences. Perseus also will maintain a record of any marketing campaign in accordance with the Commission's rules.

Perseus takes reasonable measures to discover and protect against attempts to gain against unauthorized access to CPNI. Perseus has practices and procedures in place to notify customers, if permitted, and law enforcement, as required, of a security breach which results in the unauthorized access to, use or disclosure CPNI. Perseus will maintain a record of the notification in accordance with the Commission's rules.

Perseus has designated an officer, as an agent for the company, to sign and file a CPNI compliance certificate on an annual basis.